

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Application of:	)	
	)	
Giovanni GHIGO, et al.	)	Group Art Unit: 2431
	)	
Application No. 10/589,552	)	Examiner: WRIGHT, BRYAN F
	)	
Filed: August 16, 2006	)	Confirmation No. 8465
	)	
For: METHOD AND CIRCUIT FOR	)	
GENERATING RANDOM	)	
NUMBERS, AND COMPUTER	)	
PROGRAM PRODUCT	)	
THEREFOR	)	

**Mail Stop Issue Fee**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

**Via EFS-Web**

Sir:

**COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE**

Applicant thanks the Examiner for the Notice of Allowance mailed December 23, 2011. Without withdrawing the allowed claims from issue, Applicant submits these comments for the record.

In the Notice of Allowance, the Examiner provided a statement of reasons for allowance, which emphasized or focused on certain elements of the independent claims. Although Applicant agrees with the Examiner's ultimate conclusion that the claims are allowable, Applicant submits that the claims are allowable not solely because certain elements of the claims are not disclosed by prior art, but because they recite novel and non-obvious combinations of elements, including combinations not mentioned


in the Examiner's statement. Applicant also does not necessarily subscribe to the Examiner's characterization of the disclosure of the newly cited reference in relation to the claim language to the extent that the characterization is inconsistent with the actual disclosure of the cited reference.

If there is any fee due in connection with the filing of these Comments, please charge the fee to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, L.L.P.

Dated: March 22, 2012

By:   
Ernest F. Chapman  
Reg. No. 25,961